

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DR. MORGAN REYNOLDS on behalf of the
UNITED STATES OF AMERICA,

Plaintiff / Realtor,

vs.

SCIENCE APPLICATIONS INTERNATIONAL
CORP.; APPLIED RESEARCH ASSOCIATES, INC.;
BOEING; NuSTATS; COMPUTER
AIDED ENGINEERING ASSOCIATES, INC.;
DATASOURCE, INC.; GEOSTAATS, INC.;
GILSANZ MURRAY STEFICEK LLP;
HUGHES ASSOCIATES, INC.; AJMAL
ABBASI, EDUARDO KAUSEL;
DAVID PARKS; DAVID SHARP; DANIELE
VENEZANO; JOSEF VAN DYCK, KASPAR
WILLIAM; ROLF JENSEN & ASSOCIATES,
INC.; ROSENWASSER/GROSSMAN CONSULTING
ENGINEERS, P.C.; SIMPSON GUMPERTZ &
HEGER, INC.; S.K. GHOSH ASSOCIATES,
INC.; SKIDMORE, OWINGS & MERRILL,
LLP; TENG & ASSOCIATES, INC.;
UNDERWRITERS LABORATORIES, INC.;
WISS, JANNEY, ELSTNER ASSOCIATES,
INC.; AMERICAN AIRLINES; SILVERSTEIN
PROPERTIES; and UNITED AIRLINES,

Defendants.

X

Civil Action
No. 07 CV 4612

ECF CASE

**REQUEST FOR JUDICIAL
NOTICE PURSUANT TO
FED. R. EVID. 201**

Defendant Skidmore, Owings & Merrill, LLP ("SOM") respectfully requests that pursuant to FED. R. EVID. 201, this Court take judicial notice of the following fact that is not subject to reasonable dispute in any jurisdiction:

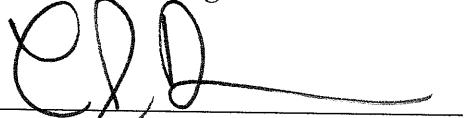
On September 11, 2001, terrorists hijacked commercial airplanes and flew them into the north and south towers of the World Trade Center, destroying both buildings.

This fact is also capable of accurate and ready determination pursuant to the findings of both the Supreme Court of the United States in *Hamdan v. Rumsfeld*,¹ 126 S. Ct. 2749, 2760, 165 L. Ed. 2d 723, 739 (2006) and the United States Court of Appeals for the Second Circuit in *SR Int'l Bus. Ins. Co. v. World Trade Ctr. Props., LLC*,² 467 F.3d 107, 116 (2d Cir. 2006).

Dated: New York, New York
February 4, 2008

Respectfully submitted,

ZETLIN & DE CHIARA, LLP
Attorneys for Defendant
Skidmore, Owings & Merrill LLP



Louis J. Dennis (LD 5727)
801 Second Avenue
New York, New York 10017
(212) 682-6800
ldennis@zdlaw.com

¹ The Supreme Court found that:

On September 11, 2001, agents of the al Qaeda terrorist organization hijacked commercial airplanes and attacked the World Trade Center in New York City and the national headquarters of the Department of Defense in Arlington, Virginia. Americans will never forget the devastation wrought by these acts. Nearly 3,000 civilians were killed.

126 S. Ct. at 2760, 165 L. Ed. 2d at 739.

² The Court of Appeals for the Second Circuit found that:

On the morning of September 11, 2001, terrorists flew two fuel-laden jetliners into the north and south towers of the WTC, destroying both buildings and cutting short the lives of thousands of people.

467 F.3d at 116.

Index No.

07 Civ. 4612

Year

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

DR. MORGAN REYNOLDS on behalf of the
UNITED STATES OF AMERICA,

Plaintiff/Realtor,

-against-

SCIENCE APPLICATIONS INTERNATIONS CORP.; ET. AL.
Defendants.

REQUEST FOR JUDICIAL NOTICE PURSUANT TO FED. R. EVID. 201

ZETLIN & DE CHIARA LLP

Attorney(s) for **Skidmore, Owings & Merrill, LLP**

Office and Post Office Address
801 SECOND AVENUE
NEW YORK, N.Y. 10017
(212) 682-6800

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that upon information and belief and reasonable inquiry, the contentions contained in the annexed documents are not frivolous.

Dated: _____

Signature _____

Print Signer's Name _____

Service of a copy of the within

is hereby admitted.

Dated,

Attorney(s) for _____

Sir: Please take notice

NOTICE OF ENTRY

that the within is a (certified) true copy of a
duly entered in the office of the clerk of the within named court on

NOTICE OF ENTRY

that an order
settlement to the HON.
judges

of which the within is a true copy will be presented for
one of the

of the within named Court, at
on the _____ day of
Dated,

at M.

ZETLIN & DE CHIARA LLP

Attorney(s) for

Office and Post Office Address
801 SECOND AVENUE
NEW YORK, N.Y. 10017